

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Telecommunications Carrier Eligibility to Receive)	
Universal Service Support)	WC Docket No. 09-197
)	WC Docket No. 11-42
Lifeline and LinkUp Reform and Modernization)	
)	
Total Call Mobile, Inc. (Compliance Plan))	
)	

TOTAL CALL MOBILE, INC'S COMPLIANCE PLAN

On May 25, 2011, Total Call Mobile, Inc. ("TCM" or "Company")¹ filed a Petition for Forbearance ("Petition") requesting the Commission forbear from enforcement of section 214(e)(1)(A) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(e)(1)(A), which requires eligible telecommunications carriers ("ETCs") to use their own facilities to provide services supported by the Universal Service Fund ("USF").

On February 6, 2012, the Federal Communications Commission ("FCC" or "Commission") granted TCM's Petition for Forbearance, conditioned on fulfillment of the obligations detailed in the *Lifeline Reform Order*,² which also required each carrier to submit to

¹ The Company hereby also reports its corporate and trade names, along with its holding company, operating companies and affiliates as follows: Total Call International is the parent of Total Call Mobile; KDDI of America is the majority owner of Total Call International; Locus Telecommunications and KDDI Global are affiliates of Total Call International.

² See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report And Order and Further Notice of Proposed

the Commission for approval a Compliance Plan outlining the measures it will take to implement the conditions imposed by the Commission in its *Lifeline Reform Order*.

The Company will comply fully with all conditions set forth in the *Lifeline Reform Order*, as well as with the Commission's Lifeline rules and policies more generally.³ Company will comply with 911 requirements as described below in its Compliance Plan. Company also will implement the foregoing objectives and the other objectives described in the *Lifeline Reform Order*. Specifically, this Compliance Plan: (1) describes the specific measures that the Company will take to implement the obligations contained in the *Lifeline Reform Order*, including the procedures the Company follows in enrolling a subscriber in Lifeline and submitting for reimbursement for that subscriber from the Fund; (2) describes the materials related to initial and ongoing certifications and the sample marketing materials; and (3) provides a detailed description of how the Company offers Lifeline services, the geographic areas in which it offers services, and a detailed description of the Company's Lifeline service plan offerings.

II. TOTAL CALL MOBILE'S COMPLIANCE PLAN

A. TOTAL CALL MOBILE'S ACCESS TO 911 AND E911 SERVICES

Pursuant to the *Lifeline Reform Order*, forbearance is conditioned upon Company (1) providing its Lifeline subscribers with 911 and E911 access, regardless of activation status and

Rulemaking, FCC 12-11, ¶¶ 521, 523 (Feb. 6, 2012) ("*Lifeline Reform Order*"). TCM herein submits the information required by the Compliance Plan Public Notice. See *Wireline Competition Bureau Provides Guidance for the Submission of Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 12-314 (rel. Feb. 29, 2012).

³ In addition, this Compliance Plan is consistent with the compliance plan filed by Cricket Communications, Inc. See Notice of *Ex Parte* Communication of Cricket Communications, Inc., WC Docket No. 09-197 (Sept. 23, 2011) ("Cricket Compliance Plan"). The Wireline Competition Bureau approved the Cricket Compliance Plan on February 7, 2012. See *Telecommunications Carriers Eligible for Universal Service Support, Cricket Communications, Inc. Petition for Forbearance*, WC Docket No. 09-197, Order, DA 12-158 (Feb. 7, 2012).

availability of minutes; and (2) providing its Lifeline subscribers with E911-compliant handsets and replacing, at no additional charge to the subscriber, noncompliant handsets of Lifeline-eligible subscribers who obtain Lifeline-supported services.⁴ Company will comply with these conditions upon initiation of its Lifeline service.

Company will provide its Lifeline customers with access to 911 and E911 services immediately upon activation of service. The Commission and consumers are hereby assured that all Company customers will have available access to emergency calling services at the time that the handset is activated, and that such 911 and E911 access will be available from Company handsets, even if the account associated with the handset has no minutes remaining.

The Company's existing practices currently provide access to 911 and E911 services for all customers. Company uses Sprint as its underlying network provider/carrier. Sprint routes 911 calls from Company's customers in the same manner as 911 calls from Sprint's own retail customers. To the extent that Sprint is certified in a given PSAP territory, this 911 capability will function the same for Company. Company (via Sprint) also currently enables 911 emergency calling services for all properly activated handsets regardless of whether the account associated with the handset is active, suspended or terminated. Finally, the Company (via Sprint) transmits all 911 calls initiated from any of its handsets even if the account associated with the handset has no remaining minutes.

Company will ensure that all handsets used in connection with the Lifeline service offering are E911-compliant. In point of fact, Company's phones have always been and will continue to be 911 and E911-compliant. Company uses phones that have been through a stringent certification process with Sprint, which, among other things, ensures that the handset

⁴ See *Lifeline Reform Order*, ¶ 373.

models used meet all 911 and E911 requirements. As a result, any customer that qualifies for and elects Lifeline service will already have a 911/E911-compliant handset, which will be confirmed at the time of enrollment in the Lifeline program. Any new customer that qualifies for and enrolls in the Lifeline program is assured of receiving a 911/E911-compliant handset as well, free of charge.

B. PROCEDURES TO ENROLL A SUBSCRIBER IN LIFELINE

1. Policy

The Company will comply with the uniform eligibility criteria established in new section 54.409 of the Commission's rules (when it becomes effective on June 1, 2012), as well as any additional certification and verification requirements for Lifeline eligibility in states where the Company is designated as an ETC. In states where there are no state-imposed requirements, the Company will comply with the certification and verification procedures in effect in that state as reflected on the website of the Universal Service Administration Company ("USAC").⁵ For any states that do not have established rules of procedure in place, the Company will comply with the certification and verification procedures in effect in that state as reflected in the *Lifeline Reform Order* and the rules.

All subscribers will be required to demonstrate eligibility based at least on: (1) household income at or below 135% of the Federal Poverty Guidelines for a household of that size; or (2) the household's participation in one of the federal assistance programs listed in new section 54.409(a)(2) and 54.409(a)(3) of the Commission's rules. In addition, through the certification requirements described below, Company will confirm that the subscriber is not already receiving

⁵ See Cricket Compliance Plan at 3.

a Lifeline service and no one else in the subscriber's household is subscribed to a Lifeline service.

2. Eligibility Determination

If Company cannot determine a prospective subscriber's eligibility for Lifeline by accessing income databases or program eligibility databases, Company's employees or agents ("Company personnel") will review documentation establishing eligibility pursuant to the Lifeline rules.⁶ All personnel who interact with actual or prospective customers will be trained to assist Lifeline applicants in determining whether they are eligible to participate based on the federal and state-specific income-based and/or program-based criteria. These personnel will be trained to answer questions about Lifeline eligibility, and will review required documentation to determine whether it satisfies the *Lifeline Reform Order* and state-specific eligibility requirements using state-specific checklists.⁷

Proof of Eligibility. Company personnel will be trained on acceptable documentation required to establish income-based and program-based eligibility.⁸ Acceptable documentation of program eligibility includes: (1) the current or prior year's statement of benefits from a qualifying state or federal program; (2) a notice letter of participation in a qualifying state or federal program; (3) program participation documents (*e.g.*, the consumer's Supplemental Nutrition Assistance Program (SNAP) electronic benefit transfer card or Medicaid participation

⁶ See *Lifeline Reform Order*, ¶ 100; 47 C.F.R. §§ 54.410(b)(1)(i)(B), 54.410(c)(1)(i)(B); Cricket Compliance Plan at 4.

⁷ See Cricket Compliance Plan at 6.

⁸ See *Lifeline Reform Order*, ¶ 101.

card (or copy thereof)); or (4) another official document evidencing the consumer's participation in a qualifying state or federal program.⁹

Acceptable documentation of income eligibility includes the prior year's state or federal tax return, current income statement from an employer or paycheck stub, a Social Security statement of benefits, a Veterans Administration statement of benefits, a retirement/pension statement of benefits, an Unemployment/Workmen's Compensation statement of benefits, federal notice letter of participation in General Assistance, or a divorce decree, child support award, or other official document containing income information for at least three months time.¹⁰

Company personnel will examine this documentation for each Lifeline applicant, and will record the type of documentation used to satisfy the income- or program-based criteria.¹¹ The Company will not retain a copy of this documentation.¹² Where the Company personnel conclude that proffered documentation is insufficient to establish such eligibility, the Company will deny the associated application and inform the applicant of the reason for such rejection.¹³ In the event that Company personnel cannot ascertain whether documentation of a specific type is sufficient to establish an applicant's eligibility, the matter will be escalated to supervisory personnel.¹⁴

De-Enrollment for Ineligibility. If Company has a reasonable basis to believe that one of its Lifeline subscribers no longer meets the eligibility criteria, Company will notify the subscriber of impending termination in writing and in compliance with any applicable state

⁹ *Id.* and 47 C.F.R. § 54.410(c)(1)(i)(B).

¹⁰ *See Lifeline Reform Order*, ¶101; 47 C.F.R. § 54.410.(b)(1)(i)(B).

¹¹ *See Lifeline Reform Order*, ¶101; 47 C.F.R. §§ 54.410(b)(1)(iii), 54.410(c)(1)(iii).

¹² *See Lifeline Reform Order*, ¶101; 47 C.F.R. §§ 54.410(b)(1)(ii), 54.410(c)(1)(ii).

¹³ *See Cricket Compliance Plan* at 6.

¹⁴ *See Cricket Compliance Plan* at 6.

dispute resolution procedures applicable to Lifeline termination, and give the subscriber 30 days to demonstrate continued eligibility.¹⁵ A demonstration of eligibility must comply with the annual verification procedures below and found in new rule section 54.410(f), including the submission of a certification form.

3. Subscriber Certifications for Enrollment

The Company will implement certification policies and procedures that enable consumers to demonstrate their eligibility for Lifeline assistance to Company personnel as detailed in the *Lifeline Reform Order*, together with any additional state certification requirements.¹⁶ The Company shares the Commission's concern about abuse of the Lifeline program and is thus committed to the safeguards stated herein, with the belief that these procedures will prevent the Company's customers from engaging in such abuse of the program, inadvertently or intentionally.¹⁷

TCM will implement certification procedures that require consumers to demonstrate their eligibility for Lifeline assistance. Customers will be able to sign up for Lifeline assistance by contacting TCM via telephone, facsimile, or the internet. Company personnel will verbally explain the eligibility criteria to consumers when they are enrolling in person or over the phone.¹⁸ At the point of sale, consumers will be provided with printed information describing TCM's Lifeline program in detail, including federal and state specific eligibility requirements, and instructions for enrolling, a description of the one-per-household rule and a copy of USAC's

¹⁵ See *Lifeline Reform Order*, ¶ 143; 47 C.F.R. § 54.405(e)(1).

¹⁶ *Lifeline Reform Order*, ¶ 61; 47 C.F.R. § 54.410(a).

¹⁷ See Cricket Compliance Plan at 3.

¹⁸ See *Lifeline Reform Order*, ¶ 123.

printed material describing the one-per-household rule.¹⁹ These materials (like all Lifeline marketing materials) also will clearly identify supported plans as “Lifeline” plans, consistent with TCM’s current practice and policies. Consumers will be directed to a toll-free telephone number and to TCM’s website, which will contain a link to information regarding the Company’s Lifeline service plan, including a detailed description of the program, rates, and federal and state-specific eligibility criteria.

TCM will have direct contact with all customers applying for participation in the Lifeline program either by mail or by phone and all marketing materials will include TCM’s customer service number. Retailers and distributors will be able to assist customers in completing applications but will provide TCM’s customer service number for further questions and assistance. Retailers or customers will then directly send the applications and supporting documents to TCM. Retailers will not retain any copies of the customer application or supporting documentation, and company personnel will review and process all applications.

4. Call Center Procedures

Consumers will be directed to call a toll-free number to complete an application over the phone. The application will then be mailed to the customer for signature under penalty of perjury and for the submission of supporting documentation. The signed application and support documentation must be mailed to the address provided by the Company (or, if available to the consumer, returned by facsimile or electronic transmission). Processing of consumers’ applications, including review of all application forms and relevant documentation will be performed under TCM’s supervision by managers thoroughly trained in the requirements of the

¹⁹ See *Lifeline Reform Order*, ¶79.

Lifeline program. TCM will ensure that all required documentation is taken care of properly by using federal and state-specific compliance checklists.

TCM will emphasize the “one Lifeline phone per household” restriction during the initial interview with the potential customer when they call into the call center. The call center introduction script substantially in the form TCM would use is attached as Exhibit A.

5. In-Person Sales Efforts

TCM will promote its Lifeline services through many channels. One sales channel will be in-person sales events staffed by TCM representatives or agents. At these events, customers will be allowed to sign up, in-person, for Lifeline service. TCM representatives or agents, fully trained in Lifeline requirements, will conduct an interview, ensuring that the potential customer does not already receive a Lifeline subsidy. Documentation proving eligibility for the program will also be collected and an application will be completed by the customer. Only after completing all required eligibility verification will TCM issue phones to the customer.

At retail outlets where trained TCM representatives or agents are not present, customers will not have access to Lifeline services (or receive a Lifeline handset) at the retail location. Instead, customers will be directed via print ads and information brochures to contact TCM directly, and to submit the Lifeline service application directly to TCM. Through TCM’s certification procedures, the company would verify that the individual qualifies for a Lifeline plan (*i.e.* that there is no duplication, and that the individual qualifies by virtue of participation in an eligible state or federal low income program). Only after the customer is verified as qualifying to receive Lifeline will the phone be provided to the customer via mail or subsequent pickup.

6. Applications, Information and Disclosures

Every applicant will be required to complete an application/certification process containing disclosures, and collecting certain information and certifications as discussed below.²⁰

Disclosures. TCM's application and certification process will include the following disclosures: (1) Lifeline is a federal benefit and that willfully making false statements to obtain the benefit can result in fines, imprisonment, de-enrollment or being barred from the program; (2) only one Lifeline service is available per household; (3) a household is defined, for purposes of the Lifeline program, as any individual or group of individuals who live together at the same address and share income and expenses; (4) a household is not permitted to receive Lifeline benefits from multiple providers; (5) violation of the one-per-household limitation constitutes a violation of the Commission's rules and will result in the applicant's de-enrollment from the program; and (6) Lifeline is a non-transferable benefit and the applicant may not transfer his or her benefit to any other person.²¹

Applicants will also be informed that (1) the service is a Lifeline service, (2) Lifeline is a government assistance program, and (3) only eligible consumers may enroll in the program.²²

In addition, Company will notify the applicant that the prepaid service must be personally activated by the subscriber and the service will be deactivated and the subscriber de-enrolled if the subscriber does not use the service for 60 days.²³

Information Collection. TCM will also collect the following information from the applicant in the application/certification process: (1) the applicant's full name;²⁴ (2) the

²⁰ See Model Application/Certification Form (Maryland), included as Exhibit B. See Compliance Plan Public Notice at 3.

²¹ See *Lifeline Reform Order*, ¶ 121; 47 C.F.R. § 54.410(d)(1).

²² See 47 C.F.R. § 54.405(c).

²³ See *Lifeline Reform Order*, ¶ 114.

applicant's full residential address (P.O. Box is not sufficient²⁵); (3) whether the applicant's residential address is permanent or temporary; (4) billing address will not be requested as the service will be on TCM's prepaid platform (i.e. there will be no bill sent); (5) the applicant's date of birth; (6) the last four digits of the applicant's Social Security number; (7) if the applicant is seeking to qualify for Lifeline under the program-based criteria, the name of the qualifying assistance program from which the applicant, his or her dependents, or his or her household receives benefits;²⁶ and (8) if the applicant is seeking to qualify for Lifeline under the income-based criterion, the number of individuals in his or her household.²⁷

Applicant Certification. Consistent with new rule section 54.410(d)(3), TCM will require the applicant to certify, under penalty of perjury, in writing or by electronic signature or interactive voice response recording,²⁸ the following:

1. the applicant meets the income-based or program-based eligibility criteria for receiving Lifeline;
2. the applicant will notify the Company immediately, and, in any event, within a maximum of 30 days, if for any reason he or she no longer satisfies the criteria for receiving Lifeline including, as relevant, if the applicant no longer meets the income-based or program-based criteria for receiving Lifeline support, if the applicant is receiving more than one Lifeline benefit, or if another member of the applicant's household is receiving a Lifeline benefit;
3. if the applicant moves to a new address, he or she will provide that new address to the Company within 30 days;
4. if the applicant provided a temporary residential address to the Company, the applicant will be required to verify his or her temporary residential address every 90 days;

²⁴ See Cricket Compliance Plan at 4.

²⁵ See *Lifeline Reform Order*, ¶ 87.

²⁶ See Cricket Compliance Plan at 4.

²⁷ See 47 C.F.R. § 54.410(d)(2). See Cricket Compliance Plan at 4.

²⁸ See *Lifeline Reform Order*, ¶¶ 168-69; 47 C.F.R. § 54.419.

5. the applicant's household will receive only one Lifeline service and, to the best of the applicant's knowledge, the applicant's household is not already receiving a Lifeline service;²⁹

6. the information contained in the applicant's certification form is true and correct to the best of the applicant's knowledge;

7. the applicant acknowledges that providing false or fraudulent information to receive Lifeline benefits is punishable by law; and

8. the applicant acknowledges that the applicant may be required to re-certify his or her continued eligibility for Lifeline at any time, and the applicant's failure to re-certify as to the applicant's continued eligibility will result in de-enrollment and the termination of the applicant's Lifeline benefits pursuant to the de-enrollment policy included below and in the Commission's rules.

Applicants will also be required to certify under penalty of perjury that they are head of their household and receive Lifeline-supported service only from TCM. Penalties for perjury will be clearly stated on the certification form.³⁰ This will be accomplished by a certification form substantially similar in format to the Model Application/Certification Form (Maryland), included as Exhibit B. Customers will be required to sign and date this statement.

In addition, the applicant will be required to authorize TCM to access any records required to verify the applicant's statements in the application/certification process and to confirm the applicant's eligibility for the Company Lifeline credit.³¹ The applicant must also authorize TCM to release any records required for the administration of the Company Lifeline credit program, including to USAC to be used in an Lifeline program eligibility database.³²

C. Annual Verification Procedures

²⁹ See Cricket Compliance Plan at 4.

³⁰ See Cricket Compliance Plan at 5.

³¹ See Cricket Compliance Plan at 5.

³² See 47 C.F.R. § 54.404(b)(9). The application/certification form will also describe the information that will be transmitted, that the information is being transmitted to USAC to ensure the proper administration of the Lifeline program and that failure to provide consent will result in the applicant being denied the Lifeline service. *See id.* See also Cricket Compliance Plan at 5.

TCM will annually re-certify all subscribers by querying the appropriate eligibility databases (when it becomes available) or, if no eligibility database is available, by obtaining a signed certification from each subscriber consistent with the certification requirements above and new section 54.410(d) of the rules. This certification will include a confirmation that the applicant's household will receive only one Lifeline service and, to the best of the subscriber's knowledge, the subscriber's household is receiving no more than one Lifeline service.³³ Company will notify each participating Lifeline customer prior to his or her service anniversary date that he or she must confirm his or her continued eligibility in accordance with the applicable requirements.³⁴ Further, the verification materials will inform the subscriber that he or she is being contacted to re-certify his or her continuing eligibility for Lifeline and if the subscriber fails to respond, he or she will be de-enrolled in the program.³⁵

2012 Verification. Company will re-certify (if applicable) the eligibility of each of its existing subscribers as of June 1, 2012 on a rolling basis by the end of 2012 and report the results to USAC by January 31, 2013.³⁶ Company will contact its subscribers via text message to their Lifeline supported telephone, or by mail, phone, email or other Internet communication. The notice will explain the actions the customer must take to retain Lifeline benefits, when Lifeline benefits may be terminated, and how to contact the Company.

Verification De-Enrollment. Company will give subscribers 30 days to respond to the annual verification inquiry. Company will de-enroll subscribers that do not respond to the

³³ See *Lifeline Reform Order*, ¶ 120 and Cricket Compliance Plan at 8.

³⁴ See Cricket Compliance Plan at 8.

³⁵ See *Lifeline Reform Order*, ¶ 145.

³⁶ See *Lifeline Reform Order*, ¶ 130.

annual verification or fail to provide the required certification.³⁷ If the subscriber does not respond, the Company will send a separate written notice explaining that failure to respond within 30 days will result in the subscriber's de-enrollment from the Lifeline program. If the subscriber does not respond within 30 days, Company will de-enroll the subscriber within five business days thereafter.

D. Activation and Non-Usage

Company will not consider a prepaid subscriber activated, and will not seek reimbursement for Lifeline for that subscriber, until the subscriber activates Company's prepaid service through usage of the service.³⁸ In addition, after service activation, Company will provide a de-enrollment notice to subscribers that have not used their service for 60 days. After 60 days of non-use, Company will provide notice to the subscriber that failure to use the Lifeline service within a 30-day notice period will result in de-enrollment.³⁹ For these purposes, subscribers will be considered to "use" the service by: (1) completing an outbound; (2) purchasing minutes from Company to add to the subscriber's plan; (3) answering an incoming call from a party other than Company; or responding to a direct contact from Company and confirming that the subscriber wants to continue receiving the service.⁴⁰

If the subscriber does not respond to the notice, the subscriber will be de-enrolled and Company will not request further Lifeline reimbursement for the subscriber. Company will

³⁷ See *Lifeline Reform Order*, ¶ 142; 47 C.F.R. § 54.54.405(e)(4).

³⁸ See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.407(c)(1).

³⁹ See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3). See Cricket Compliance Plan at 2 (stating that it did not need to implement a non-usage policy because it offered only plans with unlimited local and long distance calling).

⁴⁰ See *Lifeline Reform Order*, ¶ 261; 47 C.F.R. § 54.407(c)(2).

report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁴¹

E. Additional Measures to Prevent Waste, Fraud and Abuse

To supplement its verification and certification procedures, and to better ensure that customers understand the Lifeline service restrictions with respect to duplicates, the Company will implement measures and procedures to prevent duplicate Lifeline benefits being awarded to the same household. These measures entail additional emphasis in written disclosures as well as live due diligence.⁴²

In addition to checking the national database when it becomes available, Company personnel will emphasize the “one Lifeline phone per household” restriction in their direct sales contacts with potential customers.⁴³ Training materials will include a discussion of the limitation to one Lifeline phone per household, and the need to ensure that the customer is informed of this restriction.⁴⁴

Database. When the National Lifeline Accountability Database (“National Database”) becomes available, Company will comply with the requirements of new rule section 54.404. Company will query the National Database to determine whether a prospective subscriber is currently receiving a Lifeline service from another ETC and whether anyone else living at the prospective subscriber’s residential address is currently receiving Lifeline service.⁴⁵

⁴¹ See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

⁴² See Cricket Compliance Plan at 9.

⁴³ See Cricket Compliance Plan at 6, 9.

⁴⁴ *Id.*

⁴⁵ See *Lifeline Reform Order*, ¶ 203. Company will also transmit to the National Database the information required for each new and existing Lifeline subscriber. See *Lifeline Reform Order*, ¶¶ 189-195; 47 C.F.R. § 54.404(b)(6). Further, Company will update each subscriber’s information in the National Database within ten business days of any

One-Per-Household. Company will implement the requirements of the *Lifeline Reform Order* to ensure that it provides only one Lifeline benefit per household⁴⁶ through the use of its application and certification forms discussed above, internal database checks and its marketing materials discussed below. Upon receiving an application for Company's Lifeline service, Company will search its own internal records to ensure that it does not already provide Lifeline-supported service to someone at the same residential address.⁴⁷ If it does discover duplicate service at an address, Company will require the applicant to complete and submit a written USAC document containing the following: (1) an explanation of the Commission's one-per-household rule; (2) a check box that an applicant can mark to indicate that he or she lives at an address occupied by multiple households; (3) a space for the applicant to certify that he or she shares an address with other adults who do not contribute income to the applicant's household and share in the household's expenses or benefit from the applicant's income, pursuant to the Commission's definition; and (4) the penalty for a consumer's failure to make the required one-per-household certification (*i.e.*, de-enrollment).⁴⁸ Further, if a subscriber provides a temporary address on his or her application/certification form collected as described above, Company will verify with the subscriber every 90 days that the subscriber continues to rely on that address.⁴⁹

change, except for de-enrollment, which will be transmitted within one business day. *See* 47 C.F.R. § 54.404(b)(8),(10).

⁴⁶ A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. *See Lifeline Reform Order*, ¶ 74; 47 C.F.R. § 54.400(h).

⁴⁷ *See Lifeline Reform Order*, ¶ 78 and *See Cricket Compliance Plan* at 7.

⁴⁸ *Id.*

⁴⁹ *See Lifeline Reform Order*, ¶ 89.

Finally, Company personnel will inform each Lifeline applicant that he or she may be receiving Lifeline support under another name, and will facilitate the applicant's understanding of what constitutes "Lifeline-supported services." The Company personnel will also assist the applicant in determining if he or she is already benefiting from Lifeline support, by identifying the leading Lifeline offerings in the relevant market by brand name.⁵⁰

Marketing Materials. Within the deadline provided in the *Lifeline Reform Order*, TCM will include the following information regarding its Lifeline service on all marketing materials describing the service: (1) it is a Lifeline service,⁵¹ (2) Lifeline is a government assistance program, (3) the service is non-transferable, (4) only eligible consumers may enroll in the program, (5) the program is limited to one discount per household, consisting of either one wireline or one wireless service; (6) what documentation is necessary for enrollment;⁵² (7) TCM's name as the ETC; and (8) consumers who willfully make a false statement in order to obtain the Lifeline benefit can be punished by fine or imprisonment or can be barred from the program.⁵³ These statements will be included in all print, audio video and web materials (including social networking media) used to describe or enroll customers in Company's Lifeline service offering, as well as Company's application forms and certification forms.⁵⁴ This specifically includes Company's website (totalcallmobile.com/lifeline).⁵⁵ A sample of Company's Lifeline marketing materials is included as Exhibit C.

F. Company Reimbursements From the Fund

⁵⁰ See Cricket Compliance Plan at 7.

⁵¹ See Cricket Compliance Plan at 4.

⁵² See Cricket Compliance Plan at 4.

⁵³ See *Lifeline Reform Order*, ¶ 275; 47 C.F.R. § 54.405(c).

⁵⁴ *Id.*

⁵⁵ *Id.*

To ensure that the Company does not seek reimbursement from the Fund without a subscriber's consent, Company will certify, as part of each reimbursement request, that it is in compliance with all of the Commission's Lifeline rules and, to the extent required, has obtained valid certification and verification forms from each of the subscribers for whom it is seeking reimbursement.⁵⁶ In addition, Company will keep accurate records as directed by USAC⁵⁷ and as required by new section 54.417 of the Commission's rules.

Further, if applicable, the Company will transition the submission of its FCC Forms 497 to the eighth day of each month in order to be reimbursed the same month, and inform USAC, to the extent necessary, to transition its reimbursement process to actual claims rather than projected claims over the course of more than one month.⁵⁸ In addition, Company will keep accurate records as directed by USAC⁵⁹ and as required by new section 54.417 of the Commission's rules.

G. Annual Company Certifications

Company will submit an annual certification to USAC, signed by a Company officer under penalty of perjury, that Company: (1) has policies and procedures in place to review consumers' documentation of income- and program-based eligibility and ensure that its Lifeline subscribers are eligible to receive Lifeline services;⁶⁰ (2) is in compliance with all federal

⁵⁶ See *Lifeline Reform Order*, ¶ 128; 47 C.F.R. § 54.407(d).

⁵⁷ See *id.*

⁵⁸ See *Lifeline Reform Order*, ¶¶ 302-306.

⁵⁹ See 47 C.F.R. § 54.407(e).

⁶⁰ See *Lifeline Reform Order*, ¶ 126; 47 C.F.R. § 54.416(a)(1).

Lifeline certification procedures;⁶¹ and (3) has obtained a valid certification form for each subscriber for whom the carrier seeks Lifeline reimbursement.⁶²

In addition, Company will provide the results of its annual re-certifications/verifications on an annual basis to the Commission, USAC and the applicable state commission as appropriate.⁶³ Further, as discussed above, Company will report annually to the Commission the number of subscribers de-enrolled for non-usage by month.⁶⁴

The Company will also annually report to the Commission, USAC and relevant state commissions as appropriate, the company name, names of the company's holding company, operating companies and affiliates, and any branding (such as a "dba" or brand designation) as well as relevant universal service identifiers for each entity by Study Area Code.⁶⁵ Company will report annually information regarding the terms and conditions of its Lifeline plans for voice telephony service offered specifically for low income consumers during the previous year, including the number of minutes provided and whether there are additional charges to the consumer for service, including minutes of use and/or toll calls.⁶⁶ Finally, Company will annually provide detailed information regarding service outages in the previous year, the number of complaints received and certification of compliance with applicable service quality standards and consumer protection rules, as well as a certification that Company is able to function in emergency situations.⁶⁷

⁶¹ See *Lifeline Reform Order*, ¶ 127; 47 C.F.R. § 54.416(a)(2).

⁶² See 47 C.F.R. § 54.416(a)(3).

⁶³ See *Lifeline Reform Order*, ¶¶ 132,148; 47 C.F.R. § 54.416(b).

⁶⁴ See *Lifeline Reform Order*, ¶ 257; 47 C.F.R. § 54.405(e)(3).

⁶⁵ See *Lifeline Reform Order*, ¶¶ 296, 390; 47 C.F.R. § 54.422(a).

⁶⁶ See *Lifeline Reform Order*, ¶ 390; 47 C.F.R. § 54.422(b)(5).

⁶⁷ See *Lifeline Reform Order*, ¶ 389; 47 C.F.R. § 54.422(b)(1)-(4).

H. Cooperation with State and Federal Regulators

The Company will cooperate with federal and state regulators to prevent waste, fraud and abuse. More specifically, the Company will:

- Make available state-specific subscriber data, including the names and addresses of Lifeline subscribers, to USAC and to each state public utilities commission where the Company operates for the purpose of determining whether an existing Lifeline subscriber receives Lifeline service from another carrier;⁶⁸
- Assist the Commission, USAC, state commissions, and other ETCs in resolving instances of duplicative enrollment by Lifeline subscribers, including by providing to USAC and/or any state commission, upon request, the necessary information to detect and resolve duplicative Lifeline claims;
- Promptly investigate any notification that it receives from the Commission, USAC, or a state commission to the effect that one of its customers already receives Lifeline services from another carrier; and
- Immediately de-enroll any subscriber whom the Company has a reasonable basis to believe⁶⁹ is receiving Lifeline-supported service from another ETC or is no longer eligible – whether or not such information is provided by the Commission, USAC, or a state commission.⁷⁰

III. Description of Lifeline Service Offerings

Company will offer its Lifeline service in the states where it is designated as an ETC and throughout the coverage area of its underlying provider Sprint. The Company's Lifeline offering will allow customers to choose from the following options: (1) 150 minutes (including select international destinations as described in Exhibit D) per month at no charge; (2) 250 minutes (domestic only) per month at no charge; or (3) a discount off of TCM's 30-day Unlimited Talk & Text plan or TCM's 30-day Unlimited Talk, Text, & Data plan. Additional plan details are described on the sample advertisement at Exhibit C and in Exhibit E. Lifeline customers can

⁶⁸ The Company anticipates that the need to provide such information will sunset following the implementation of the national duplicates database.

⁶⁹ See 47 C.F.R. § 54.405(e)(1).

⁷⁰ See Cricket Compliance Plan at 10.

also purchase additional bundles of minutes and service (i.e. if they run out of minutes or if they want to make international calls) by purchasing TCM's refill cards online, via the customer service line, at a Western Union location, and at stores that carry TCM prepaid refills.

In addition to free or discounted voice services, Company's Lifeline plan will include a free handset (with an option to buy an upgrade) and custom calling features at no charge, including Caller ID and Voicemail. All plans include domestic long-distance at no extra per minute charge. Calls to customer service and 911 emergency services are always free, regardless of service activation or availability of minutes.

III. Demonstration of Financial and Technical Capabilities and Certifications Required for ETC Designation⁷¹

Financial and Technical Capabilities. Revised Commission rule 54.202(a)(4), 47 C.F.R. 54.202(a)(4), requires carriers petitioning for ETC designation to demonstrate financial and technical capability to comply with the Commission's Lifeline service requirements.⁷² The Compliance Plan Public Notice requires that a carriers' compliance plan include this demonstration. Among the factors the Commission will consider are: a carrier's prior offering of service to non-Lifeline subscribers, the length of time the carrier has been in business, whether the carrier relies exclusively on Lifeline reimbursement to operate; whether the carrier receives revenues from other sources and whether the carrier has been the subject of an enforcement action or ETC revocation proceeding. As discussed in Section II *supra*, TCM provides telecommunications services nationwide and is the wholly-owned subsidiary of a national prepaid telecommunications services provider. TCM's parent has been providing telecommunications services to customers for over 10 years. During this time, TCM and its

⁷¹ See Compliance Plan Public Notice at 3.

⁷² See *Lifeline Reform Order*, ¶¶ 387-388 (revising Commission rule 54.202(a)(4)).

parent have provided prepaid wireless services to non-Lifeline customers and, consequently, TCM has not and will not be relying exclusively on Lifeline reimbursement for the Company's operating revenues. TCM receives revenues from these prepaid wireless services and also has access to the financial resources of its parent company. The Company has not been the subject of any enforcement actions by the FCC nor has it been subject to any ETC revocation proceedings.

Service Requirements Applicable to Company's Support. The Compliance Plan Public Notice requires carriers to include "certifications required under newly amended section 54.202 of the Commission's rules."⁷³ Company certifies that it will comply with the service requirements applicable to the support the Company receives.⁷⁴ TCM provides all of the telecommunications service supported by the Lifeline program and will make the services available to all qualified consumers throughout the states in which it is designated as an ETC.⁷⁵ TCM's services include voice telephony services that provide voice grade access to the public switched network or its functional equivalent. Further, TCM's service offerings provide its customers with minutes of use for local service at no charge to the customer. The Company will offer a set number of minutes of local exchange service free of charge to its subscribers and will abide by any Commission-required minimum usage amounts. TCM's Lifeline offering will allow customers to choose from the following options: (1) 150 minutes (including select international destinations as described in Exhibit D) per month at no charge; (2) 250 minutes (domestic only) per month at no charge; or (3) a discount off of TCM's 30-day Unlimited Talk &

⁷³ Compliance Plan Public Notice at 3.

⁷⁴ 47 C.F.R. § 54.202(a)(1).

⁷⁵ In addition to voice telephony services, TCM's services include the nine features, *i.e.*, dual tone multi-frequency signaling, single party service and access to operator services, *etc.* previously identified in Commission rule 54.101(a).

Text plan or TCM's 30-day Unlimited Talk, Text, & Data plan. Additional plan details are described on the sample advertisement attached as C and in Exhibit E. Lifeline customers can also purchase additional bundles of minutes and service (*i.e.* if they run out of minutes or if they want to make international calls) by purchasing TCM's refill cards online, via the customer service line, at a Western Union location, and at stores that carry TCM prepaid refills.

The Company also will provide access to emergency services provided by local government or public safety officials, including 911 and E911 where available and will comply with any Commission requirements regarding E911-compatible handsets. As discussed above, TCM will comply with the Commission's forbearance grant conditions relating to the provision of 911 and E911 services and handsets.

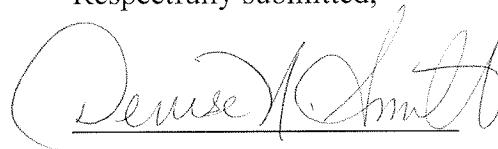
Finally, toll limitation services do not apply because TCM, like most wireless carriers, does not differentiate domestic long distance toll usage from local usage and all usage is paid for in advance. Pursuant to the *Lifeline Reform Order*, subscribers to such services are not considered to have voluntarily elected to receive TLS.⁷⁶

⁷⁶ See *Lifeline Reform Order*, ¶ 230.

III. Conclusion

TCM submits that its Compliance Plan fully satisfies the conditions set forth in the Commission's *Lifeline Reform Order*, the Compliance Plan Public Notice and the Lifeline rules. Accordingly, the Company respectfully requests that the Commission expeditiously approve its Compliance Plan.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Denise N. Smith", written over a horizontal line.

Steven A. Augustino
Denise N. Smith
Kelley Drye & Warren, LLP
3050 K Street, NW
Suite 400
Washington, D.C. 20007
(202) 342-8400

Counsel to Total Call Mobile, Inc.

March 16, 2012

Exhibit A

Total Call Mobile - Customer Service Script

Greeting: “Thank you for calling Total Call Mobile. This is (Representative Name). May I please have your name and the state you are calling from?”

** Representative “Are you calling about a new application or to check the status of a previous application?”**

- **Make sure state is an approved state**

If not ** Representative - “I am sorry, we are not currently providing service in your state. You can go to www.usac.org/li to find a provider in your state. Click on the Low Income Households section and then click on find a service provider in your state**

- **If status of application:** **Representative - “May I please have your address?”**

- ✓ locate application
- ✓ double check address (make sure the address is valid and correct)
- ✓ relate the status to customer
- ✓ note the contact on the account

- **If new application:** **Representative - “Great! Thank you for calling Total Call Mobile.”** and perform the following validations.

- a) “Are you the head of household?” If not then, “We can only provide service to the head of household. Please have the head of household call us and we’d be happy to sign them up.” If yes, go to (b).
- b) “Do you currently have wireless or home phone service?” If no, skip the remaining questions and process application.
- c) (if yes) “Is that a subsidized service or do you pay full price?”
- d) (if subsidized) “Is this phone under the Lifeline program? The Lifeline program is only available for one phone per household.” If yes go to (e), if they don’t know go to (f), if no, go to (g).
- e) “We cannot provide you with a second Lifeline phone. If there is a problem with that service or you want to be on our service, you must first disconnect your service with your other provider and then call back to establish service with us.”
- f) “Can I ask who your provider is?” Check against the larger Lifeline providers (Exhibit D, updated from time-to-time).
- g) (if not subsidized) “Can I ask who your provider is?” Check against the larger Lifeline providers (Exhibit C, updated from time-to-time).

If it is evident that they don’t already have Lifeline service then proceed for the application.

Exhibit B

Model Application/Certification Form (Maryland)



Channel ID: _____
(If Applicable)

LIFELINE PROGRAM FOR THE STATE OF MARYLAND

To apply for Lifeline through Total Call Mobile, please complete this form and submit it to the address at the bottom of the form. For more information or assistance, call 1-800-661-7391. **When you submit this application, you must include the supporting documentation indicated below. Supporting documentation will not be returned.**

1. CUSTOMER INFORMATION

First Name: _____ Last Name: _____
Home Address: _____ City: _____ State: _____ Zip Code: _____
Last 4 Digits of SSN: _____ Date of Birth (MM/DD/YYYY): _____
Phone Number: (____) - ____ - _____ Public Aid Case Number (if applicable): _____
E-mail: _____ Residence: ☐ Permanent ☐ Temporary

2. PROGRAM-BASED ELIGIBILITY

To qualify for Lifeline, you must complete either this Section or Section #3 below. Check all program(s) that the person in Section #1 is enrolled in. **If you are qualifying for Lifeline under this Section (i.e. by being enrolled in at least one of the following programs), you must provide current proof of program participation with this application.** If any member of your household is a National School Lunch participant, you can check the box for that program.

- | | |
|--|--|
| <input type="checkbox"/> Electric Universal Service Program | <input type="checkbox"/> National School Lunch Program (free program only) |
| <input type="checkbox"/> Federal Public Housing / Section 8 | <input type="checkbox"/> Public Assistance to Adults |
| <input type="checkbox"/> Food Supplement Program / Food Stamps | <input type="checkbox"/> Supplemental Security Income |
| <input type="checkbox"/> Low Income Home Energy Assistance Program | <input type="checkbox"/> Temporary Assistance for Needy Families |
| <input type="checkbox"/> Maryland Energy Assistance Program | <input type="checkbox"/> Temporary Cash Assistance |
| <input type="checkbox"/> Medicaid / Medical Assistance | <input type="checkbox"/> Temporary Disability Assistance Program |

3. INCOME-BASED ELIGIBILITY

To qualify for Lifeline, you must complete either this Section or Section #2 above. To qualify based upon your household income, the income of all of your household members must be less than the amount indicated in the table below. If your household size is greater than 8, the maximum annual household income to qualify for Lifeline is the income indicated for 8 household members plus \$5,157 for each additional household member.

Household Members: (check the box which applies)	<input type="checkbox"/> 1	<input type="checkbox"/> 2	<input type="checkbox"/> 3	<input type="checkbox"/> 4	<input type="checkbox"/> 5	<input type="checkbox"/> 6	<input type="checkbox"/> 7	<input type="checkbox"/> 8	<input type="checkbox"/> Other
Maximum Annual Household Income:	\$14,702	\$19,859	\$25,016	\$30,173	\$35,330	\$40,487	\$45,644	\$50,801	\$ _____
Customer Annual Household Income:	\$ _____								

If you qualify for Lifeline under this Section, attach the prior year's state or federal tax return for each household member or your most recent statements of income from the following sources:

- | | |
|---|--|
| • Divorce Decree / Child Support Documents | • Unemployment / Workers' Compensation Benefits Statements |
| • Paystubs (most recent three consecutive months) | • Veterans Administration Benefits Statements |
| • Retirement / Pension Benefit Statements | • W2 Statements |
| • Social Security Benefits Statements | |

Continued on Next Page



LIFELINE PROGRAM FOR THE STATE OF MARYLAND

4. LIFELINE PLAN SELECTION

Please check the box for the monthly plan that you would like to sign up for (you may change your plan at the end of any month by calling 1-800-661-7391):

☐ PLAN 1 (150 minutes including select international calls for free)

☐ PLAN 3 Unlimited Talk & Text for \$26.49 (regularly \$39.99)

☐ PLAN 2 (250 domestic minutes for free)

☐ PLAN 3 Unlimited Talk, Text & Data for \$36.49 (regularly \$49.99)

5. MULTIPLE HOUSEHOLDS AT THE SAME ADDRESS

If you reside at an address occupied by multiple households, including adults who do not contribute income to your household and/or share in your household's expenses, please contact Total Call Mobile and you will be provided an additional form to complete.

6. ACTIVATION AND USAGE REQUIREMENTS

Total Call Mobile Lifeline Plans are a prepaid service. When you receive your phone, contact Total Call Mobile at 611 to activate. To keep your account active, you must use your Lifeline service at least once during any 60 day period by completing an outbound call, purchasing additional minutes, answering an in-bound call from someone other than Total Call Mobile, or by responding to a direct contact from Total Call Mobile confirming that you want to continue receiving Lifeline service with Total Call Mobile. If your service goes unused for 60 days, you will no longer be eligible for Lifeline benefits and your service will be suspended (allowing only 911 calls and calls to customer service) subject to a 30-day cure period during which you can contact Total Call Mobile to confirm that you want to continue receiving Lifeline service from Total Call Mobile.

Continued on Next Page



LIFELINE PROGRAM FOR THE STATE OF MARYLAND

7. SIGNATURE _____

Date _____

(Required)

By initialing below, I affirm the following:

- _____ By signing above, I certify under penalty of perjury that the information contained within this enrollment form is true and correct. I further acknowledge that Lifeline is a federal benefit program and that providing false or fraudulent statements or documentation in order to receive Lifeline is punishable by law, including fines, imprisonment, de-enrollment, or being barred from the Lifeline program.
- _____ I meet the income-based or program-based eligibility criteria for receiving Lifeline service and have provided documentation of eligibility as required by this enrollment form.
- _____ I understand that Lifeline is only available for one landline or one wireless phone per household (not both); and that a violation of this requirement would constitute a violation of law and would result in my de-enrollment from the Lifeline program.
- _____ My household is not already receiving Lifeline service from another company. I certify that I am the head of my household and understand that, for the purposes of the Lifeline program, a household is an individual or group of individuals who live together at the same address and share the same income and expenses.
- _____ I understand that I may be required to verify my continued eligibility for the Lifeline program at any time and that failure to do so will result in de-enrollment.
- _____ The address listed in this form is my primary residence, not a second home or a business. If I move to a new address, I will notify Total Call Mobile within 30 days. If I checked "Temporary" address in Section 1 above, I acknowledge that I must recertify my address every 90 days.
- _____ I will notify Total Call Mobile within 30 days if for any reason I no longer satisfy the criteria for receiving Lifeline including, as relevant, if I no longer meet the income-based or program-based criteria, I begin receiving more than one Lifeline benefit, or another member of my household starts receiving a Lifeline benefit.
- _____ I authorize Total Call Mobile to access my records in order to verify eligibility as required by federal or state agencies. I understand that my information (specifically, my full name, address, date of birth and the last four digits of my social security number) will be transmitted to administrators managing state and/or federal databases.
- _____ Lifeline is not transferable. I will only use this phone for my family's own use and will not resell it.
- _____ In addition, I acknowledge that Lifeline enrollment may be terminated by Total Call Mobile in the event that the federal or state Lifeline Programs are changed or terminated, if I no longer qualify for Lifeline, if Total Call Mobile discontinues its Lifeline participation, if I do not use the Lifeline phone for 60 days, or if I breach the terms and conditions at totalcallmobile.com/lifeline.

Please mail this application, with supporting documentation to:

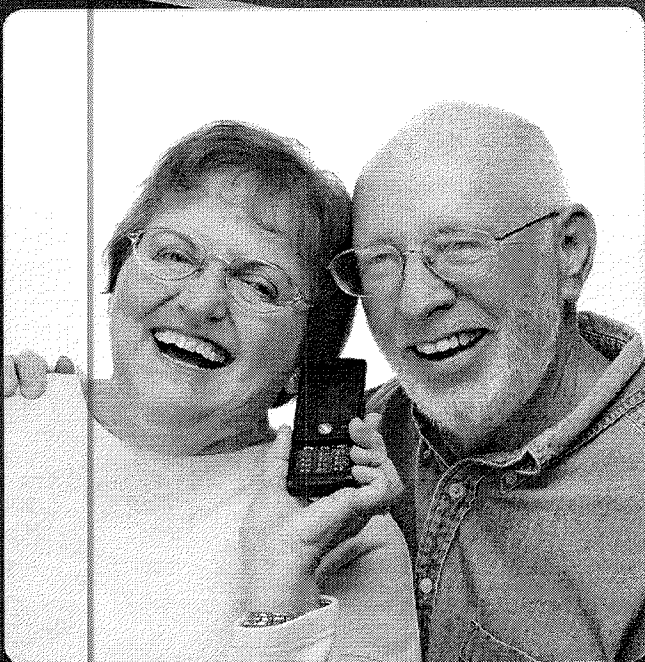
Total Call Mobile, Lifeline Program
1411 W. 190th Street, Suite 700, Gardena, CA 90248

Exhibit C

Sample Lifeline Brochure

Total Call mobile

Free Mobile Phone and Free Service



Through the government-supported Lifeline program, you may qualify for a free mobile phone and free service. See inside for details. This is a state of Maryland brochure.

Lifeline Plans

For more information or to sign up, call 1-800-661-7391.

If you qualify for the Lifeline program in the state of Maryland, you can choose from the Lifeline Plans below. All of Total Call Mobile's Lifeline Plans have the following features:

- A free phone (selected by Total Call Mobile). Call customer service for upgrade options.
- Free customer service calls.
- Free voicemail and caller id.
- Free 911 and balance inquiry calls.
- For additional minutes, text messages, or international calls, load an "Anytime Plan" refill as described on the back of this brochure or call customer service.

Plan 1: 150 minutes per month (for domestic & select international calls)

- 150 minutes per month (for domestic & select international calls) at no cost to you.
- Plan minutes expire after 30 days.
- Additional minutes are \$0.10 per minute.
- Text messages are \$0.05 per text.
- For details on select international calls that have no extra charges, see the back of this brochure.

Plan 2: 250 minutes per month (for domestic calls)

- 250 minutes per month (for domestic calls) at no cost to you.
- Plan minutes expire after 30 days.
- Additional minutes are \$0.10 per minute.
- Text messages are \$0.05 per text.
- No international calls are included in this plan.

Plan 3: Discounted Plans (discount varies by state)

- You can purchase the Unlimited Talk & Text plan for \$26.49 (regularly \$39.99 for 30 days) or the Unlimited Talk, Text & Data plan for \$36.49 (regularly \$49.99 for 30 days). For plan details, see the back of this brochure. Please call customer service for additional information or to select this option.
- No international calls are included in these plans.

Lifeline Eligibility

Eligibility criteria varies by state. For the state of Maryland, you are eligible for Lifeline if you participate in one of these programs:

Electric Universal Service Program	National School Lunch Program (free program only)
Federal Public Housing / Section 8	Public Assistance to Adults
Food Supplement Program / Food Stamps	Supplemental Security Income
Low Income Home Energy Assistance Program	Temporary Assistance for Needy Families Program
Maryland Energy Assistance Program	Temporary Cash Assistance
Medicaid / Medical Assistance	Temporary Disability Assistance Program

You also qualify for Lifeline in the state of Maryland, if your income is less than 135% of the Federal Poverty Guidelines.

Number in Household	Household Annual Income
1	\$14,702
2	\$19,859
3	\$25,016
4	\$30,173

For details or to determine if you qualify, call us at 1-800-661-7391. Only one person per household may sign up for Lifeline. If your Lifeline Plan is not used for sixty (60) days, it will be terminated.

Lifeline Terms & Conditions

Comprehensive terms and conditions for the Total Call Mobile ("TCM") Lifeline Plans are available at www.totalcallmobile.com. All terms and conditions of service as described herein and on the reverse of this brochure apply to services provided under the Lifeline Plans. Customers understand and agree that by signing up for a Lifeline Plan with Total Call Mobile, they may not have a Lifeline plan with any other carrier (wireless or landline) and further agree to comply with any documentation or verification necessary to confirm that they qualify for Lifeline. In addition, Customer acknowledges that Lifeline Plan enrollment may be terminated at anytime by TCM in the event that the federal or state Lifeline Programs are changed or terminated. If Customer no longer qualifies for Lifeline, if TCM discontinues its Lifeline Plans, or if Customer breaches the terms and conditions. TCM, at its sole discretion, will determine whether or not a Customer is eligible for a Lifeline Plan. To remain qualified for a Lifeline Plan, Customer must successfully complete an annual verification. If Customer fails to complete annual verification within sixty (60) days of the required verification date, Customer will be de-enrolled from the Lifeline Plan. Customer agrees not to give away, resell, or offer to resell the TCM Lifeline phone or service. TCM Lifeline Plans are supported by the government assistance "Lifeline" program. Proof of eligibility is required, such as eligible program card or statement of benefits. If you willfully make false statements in order to obtain a TCM Lifeline Plan, you can be punished by fine or imprisonment or can be barred from the program.

International Texting & Calling

Call worldwide with Total Call Mobile by dialing 011 and the destination. On the Anytime Plan and Lifeline Plan 1, there is no extra charge to call certain cities in the countries listed below. Call 1-800-661-7391 for international rates on other plans or to other destinations. To make international calls, you must have Anytime Plan balance. Also, standard text message rates apply to messages sent worldwide.

Argentina	Hungary	Singapore
Australia	India	South Korea
Austria	Ireland	Spain
Brazil	Israel	Sweden
Canada	Italy	Switzerland
China	Mexico	Taiwan
Cyprus	Netherlands	Thailand
Denmark	New Zealand	United Kingdom
France	Norway	US Guam
Germany	Peru	US Puerto Rico
Greece	Poland	US Saipan
Hong Kong	Portugal	US Virgin Island

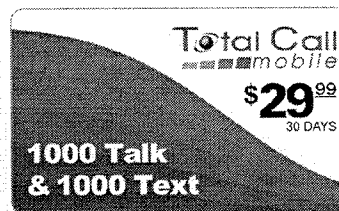
Non-Lifeline Plans

Anytime Plan



- 10¢ per minute
- 5¢ per text
- Available at \$5, \$10 or \$20
- Good for 90 Days

1000 Talk & 1000 Text



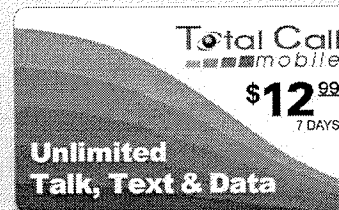
- 1000 minutes
- 1000 text messages
- Good for 30 days

Unlimited Talk & Text



- Unlimited talk & text
- Good for 30 days

Unlimited Talk, Text & Data



- Unlimited talk, text & data
- \$12.99 for 7 days
- \$24.99 for 15 days
- \$49.99 for 30 days

All plans include voicemail, caller ID, and domestic long distance. For more information, call 1-800-661-7391 or visit www.totalcallmobile.com.

Refill Options

1. Buy refills from the store where you purchased your handset.
2. Call 1-800-661-7391 to refill by credit card or debit card.
3. Visit a Western Union "prepaid service" location and enter "totalcall" in Box 1 of the prepaid services form. Enter \$10 or \$20 (Anytime), \$29.99 (1000 Talk & 1000 Text), or \$24.99 or \$49.99 (Unlimited Talk, Text & Data). For locations, call 1-800-325-6000.
4. Visit your local e-pin store (wireless store or market).



Service Terms & Conditions

Comprehensive terms and conditions are available at www.totalcallmobile.com. Total Call Mobile ("TCM") service is for personal use within the United States. "Unlimited" does not mean unreasonable use. Unreasonable use includes but is not limited to conference calling, monitoring services, abnormally large data transmissions, broadcast, telemarketing, autodialed calls, commercial uses, an abnormally high number of calls/messages or abnormally long calls, tethering to another device for data transmission, or any other usage that interferes with TCM service/network resources. Data is only available with select handsets. TCM data plans may not be used with smart phones/PDA devices unless the plan is explicitly identified for such devices. International calls are charged at the applicable rate plus air time. Advertised international rates and "Free International Locations" do not apply to calls made to foreign mobile phones or to off network/special locations and in some instances may be higher. The "Free International Locations" promotion only applies when using the Anytime Plan (i.e. 10¢ per minute) or Lifeline Plan 1 (i.e. 150 minutes). Otherwise these locations cost 2¢ per minute plus airtime. TCM reserves the right to limit picture message size at any time. Governmental taxes and fees will be charged where applicable. Plans, rates and fees are subject to change without notice. For more information, current rates, and a complete list of the "Free International Locations", please call 1-800-661-7391 or visit our website. The rates herein are valid as of January 31, 2012. TCM marks contained herein are trademarks of Total Call Mobile, Inc., and/or its affiliated companies. All copy in this brochure is copyright protected under applicable law. TCM reserves all rights with regard to TCM intellectual property.

EXHIBIT D

Free International Calling Destinations on the Lifeline 150 Minute Plan (Certain special or off-network locations may be excluded from the Free International Calling Destinations; (calls to landline phones only unless explicitly indicated otherwise)

List includes over 250 locations worldwide and 30 countries. Locations are subject to change from time to time. Please visit totalcallmobile.com for an updated list.

Featured Countries

Argentina	Greece	Norway
Argentina-Buenos Aires	Greece-Athens	Peru
Argentina-Cordoba	Hong Kong	Peru-Lima
Argentina-Mendoza	Hong Kong-Cellular	Poland
Argentina-Rosario	Hungary	Poland-Warsaw
Australia	Hungary-Budapest	Portugal
Australia-Melbourne	India	Singapore
Austria	India-Ahmedabad	Singapore-Cellular
Brazil	India-Bangalore	South Korea
Brazil-Belo Horizonte	India-Bombay	South Korea-Seoul
Brazil-Campinas	India-Calcutta	Spain
Brazil-Rio de Janeiro	India-Cellular	Sweden
Brazil-Sao Paolo	India-Hyderabad	Switzerland
Canada	India-Madras	Taiwan
China	India-New Delhi	Taiwan-Taipei
China-Beijing	India-Pune	Thailand
China-Cellular	India-Punjab	Thailand-Bangkok
China-Guangzhou	Ireland	Thailand-Cellular
China-Shanghai	Israel	United Kingdom
Cyprus	Italy	US Guam
Denmark	Mexico (city list which follows)	US Puerto Rico
France	Netherlands	US Saipan
France-Paris	Netherlands-Amsterdam	US Virgin Islands
Germany	New Zealand	

Free International Calling Destinations on the Lifeline 150 Minute Plan (continued)

Mexico City List

Guadalajara	Ciudad Constitucion	Heroica Ciudad de Ures
Ciudad de Mexico	Ciudad Cuauhtemoc	Hidalgo
Monterrey	Ciudad del Carmen	Huatabampo
Acaponeta	Ciudad Delicias	Huetamo
Acapulco	Ciudad Guzman	Huimanguillo
Actopan	Ciudad Hidalgo	Huitzuco
Agua Prieta	Ciudad Juarez	Iguala
Aguascalientes	Ciudad Lazaro Cardenas	Irapuato
Allende	Ciudad Mante	Ixtapan de la Sal
Apatzingan	Ciudad Obregon	Ixtlan del Rio
Apizaco	Ciudad Sahagun	Izucar de Matamoros
Arcelia	Ciudad Valles	Jalapa
Atlatomulco	Ciudad Victoria	Jalpa
Atliaca/Tixtla	Coatzacoalcos	Jerez de Garcia Salinas
Atlixco	Colima	Jojutla
Autlan	Cordoba	Juchitan
Bahia de Huatulco	Cosamaloapan	La Barca
Cabo San Lucas	Cozumel	La Paz
Caborca	Cuautla	La Piedad
Cadereyta Jimenez	Cuernavaca	Lago de Moreno
Campeche	Culiacan	Leon
Cananea	Durnago	Lerdo de Tejada
Cancun	Encarnacion de Diaz	Lerma
Celaya	Ensenda	Linares
Cerralvo	Estación Manuel	Los Mochis
Cheumal	Fresnillo	Los Reyes
Chihuahua	General Tapia	Magdalena
Chilapa	Guamuchil	Manuel
Chilpancingo	Guanajuato	Manuel Ojinaga
Cintalapa de Figueroa	Guasave	Manzanillo
Ciudad Acuna	Guaymas	Martinez de la Torre
Ciudad Altamirano	Guerrero Negro/Santa Rosa	Matamoros
Ciudad Camargo B	Hermosillo	Matehuala

Free International Calling Destinations on the Lifeline 150 Minute Plan (continued)

Mexico City List (continued)

Mazatlan	Rio Grande	Tenango del Aire/Tlalmanalco
Merida	Rio Verde	Tepatitlan
Mexicali	Sabinas	Tepic
Minatitlan	Sahuayo	Tequila
Monclova	Salamanca	Texcoco
Moelia	Saltillo	Teziutlan
Moroleon	Salvatierra	Ticul
Nacozari de Garcia	San Andres Tuxtla	Tijuana
Navojoa	San Cristobal de las Casas	Tizayuca
Nogales	San Fernando	Tizimin
Nuevo Casas Grandes	San Jose de Gracia	Tlapa de Comonfort/ Alcozauca de Gro.
Nuevo Laredo	San Jual del Rio	Tlaxcala
Oaxaca de Juarez	San Luis de La Paz	Toluca
Ocotlan	San Luis Potosi	Torreon
Ometepe	San Luis Rio Colorado	Tula
Orizaba	San Martin Pachivia/Teloloapa	Tulancingo
Pachuca	San Miguel de Allende	Tuxpan
Palenque	San Quintin	Tuxtepec
Parral	Santa Ana	Tuxtla Gutierrez
Parras de la Fuente	Santa Rosalia de Camargo	Uruapan
Patzcuaro	Santiago Ixcuintla	Valle de Bravo
Penjamo	Santiago Papasquiario	Veracruz
Petatlan	Santiago Tianguistenco	Villa Flores
Piedras Negras	Silao	Villahermosa
Playas de Rosarito	Tala	Yurecuaro
Poza Rica de Hgo	Tampico	Zacapu
Puebla	Tapachula	Zacatecas
Puerto Penasco	Taxco	Zamora
Puerto Vallarta	Tecate	Zihuatanejo
Puruandiro	Tecoman	Zinapécuaro
Queretaro	Tecpan de Galeana	Zitacuaro
Quimichis/Tecuala	Tehuacan	Zumpango
Reynosa	Tenancingo	

EXHIBIT E

Service Offering

TCM's Lifeline offering proposes to give eligible customers three Lifeline Plan choices:

Option 1: Lifeline 150 Minute Plan*

150 anytime minutes per month

(additional usage priced at 10 cent minutes, texts are 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail and Caller-ID
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- No additional charge for international calling to the 250 locations listed on Exhibit E (i.e. only the standard per minute rate applies)
- International calls to other destinations require additional funds based on call destination

Option 2: Lifeline 250 Minute Plan*

250 anytime minutes per month

(additional usage priced at 10 cent minutes, texts are 5 cents per text message)

Net cost to Lifeline customer: **\$0 (free)**

*This package includes:

- Free handset
- Free Voicemail and Caller-ID
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries
- International calls require additional funds based on call destination.

Option 3: Lifeline Credit - Discount Plan*

Lifeline eligible customers may choose the 30-day Unlimited Talk & Text plan or the 30-day Unlimited Talk, Text & Data at a discount off of retail. Said discount will differ based on the customer's state (ranging from \$10 - \$20). Additional details regarding TCM's plans can be found at www.totalcallmobile.com/rateplans_monthly.aspx.

*This package includes:

- Free handset
- Free Voicemail and Caller-ID
- Free calls to Customer Service
- Free calls to 911 emergency services
- Free balance inquiries